TITLE 327 WATER POLLUTION CONTROL BOARD

#03-128(WPCB)

SUMMARY/RESPONSE TO COMMENTS FROM THE FIRST COMMENT PERIOD

IDEM requested public comment from June 1, 2003 through July 30, 2003 on alternative ways to achieve the purpose of the rule and suggestions for the development of draft rule language. IDEM received comments from the following parties by the comment period deadline:

Brownsburg WWTP (BWWTP)
Carmel WWTP (CWWTP)
City of Indianapolis (CI)
Hoosier Environmental Council (HEC)
Improving Kids' Environment (IKE)
Meyer and Wyatt (MAW)
Sanitary District of Michigan City (SDMC)
Save the Dunes Council (STDC)
Van Frank Associates (VFA)

Following is a summary of the comments received and IDEM's responses thereto.

RECREATION USE DESIGNATION AND ASSOCIATED CRITERIA

Comment: All waters of the state should be designated for recreational use unless there are natural conditions that would, for safety reasons, make them unsafe for recreational use. (IKE, VFA)

Response:

Comment: Any designation of the recreational use level must be done through a process that assures that there is public input in the decision making process. A local jurisdiction should not be able to unilaterally petition for a change in designation without the active participation of the public and downstream users. (IKE)

Response:

Comment: Indiana should adopt a year round bacteria standard as findings show that *E. coli* lives longer than expected. In addition, recreational activities such as boating, fishing, and surfing can occur at times outside the traditional recreational season. (STDC, HEC)

Response:

Comment: Bacteria can over-winter in stream sediment and beaches, initiating a new population explosion when the weather becomes warm. (HEC)

Response:

Comment: All of Indiana's waters should stay designated as swimmable. Existing uses must be protected under the federal Clean Water Act, so there is no issue with that. However, some are suggesting a weaker standard for waters not now meeting that existing use. IDEM must protect downstream uses and without a TMDL to determine what levels of protection are necessary to protect those uses, they oppose weakening of the current standard. They have submitted two recent water quality monitoring reports for waters in Northwest Indiana and point out that even with bacteria issues they have, the streams meet the current standard most of the time. (STDC)

Response:

Comment: Indiana's waterways should remain designated as swimmable, whether this is an existing use or a desired future use. While many streams do not meet the swimmable standards all of the time, most meet it at least some of the time. Even if the standard were changed to a wading standard, communities with overflowing sewers would not be able to meet them. Existing uses must be protected under the federal Clean Water Act. (HEC)

Response:

Comment: Indiana should fully implement the BEACH Act in Indiana. The draft plan is almost finished and they urge this as guidance for solving some of the problems with monitoring and notification. (STDC)

Response:

(1) Adoption of different risk levels

Comment: It is probably realistic to adopt different risk levels based upon the likelihood of full body contact. Some waters are so shallow that the total immersion of the body, especially immersion of the head, would be highly unlikely to occur. However, it has to be recognized that small children are likely to ingest small quantities of water while wading or playing along the shore. Children are more likely to more susceptible to waterborne infections than are adults. (IKE, VFA)

Response:

Comment: Risk levels should be set conservatively. It should be kept in mind that risk data is

based on self-reported studies on adults and include no data on risk to children. (IKE, VFA)

Response:

Comment: Indiana should not increase the level of acceptable risk. The risk levels are determined for adults, and children are likely to be more susceptible. Further, we do not have a good handle on how may people are actually having health impacts from *E. coli* exposure in waterways. That is no excuse to allow increased illnesses. (HEC)

Response:

Comment: The SDMC encourages IDEM to adopt different risk levels for various classes of primary contact recreation. The range of risk levels should be determined by the Implementation Guidance prepared by U.S. EPA. The range of illness should be from eight (8) illnesses per one thousand (1000) swimmers to ten (10) illnesses per one thousand (1000) swimmers, which U.S. EPA indicates are the anticipated range limits in the final version of the guidance. (SDMC)

Response:

Comment: Indiana's risk levels should be categorized into three tiers. The first tier should be reserved for posted swimming access points that are clearly marked as such. This level would be the most stringent, based on U.S. EPA's risk level of eight (8) illnesses per thousand (1000) swimmers. The second level would be U.S. EPA's risk level of nine (9) illnesses per thousand (1000) swimmers, which would be for recreational waters used for public boating and general recreation. These bodies would be clearly identified and have public access points to water. The last risk level would be ten (10) illnesses per thousand (1000) swimmers that would be water bodies that are not commercially used for recreation such as drainage ditches and waters with no commercial public access points. IDEM would initially place waters in one of the three tiers with the assistance of a public participation process. After the initial designation, persons or the discharger could request for the receiving water to be redesignated, either up or down the scale during NPDES permit renewal issuance. (BWWTP, CWWTP)

Response:

Comment: CWWTP gives a range for second and third risk levels: the second level being nine (9) to possibly (11) eleven; the third level being ten (10) to possibly fourteen (14) illnesses. (CWWTP)

Response:

(2) Adoption of a secondary contact use designation

Comment: Indiana should adopt a secondary contact recreational use standard for waters that do not have potential for primary contact recreation. A total of twenty-eight (28) states have some type of secondary contact designation. (CI)

Response:

Comment: SDMC encourages IDEM to establish a secondary contact use designation defined as recommended by the *E. coli* rulemaking workgroup, that is, "Any recreational water use in which the ingestion of water is unlikely to occur. These include but are not limited to fishing, boating and limited contact incident to shoreline activities." (SDMC)

Response:

Comment: Secondary contact use designation should only be applied after completion of a use attainability analysis (UAA). A UAA will be required because all waters of the state were previously designated recreational use, and therefore, the designated use can only be changed through the UAA process. (SDMC)

Response:

Comment: Since there are no known epidemiological studies that correlate secondary contact recreation with illness rates, the criteria for a secondary contact recreation use should be narrative rather than numeric. Due to the lack of a scientific foundation (for numeric criteria), the only logical choice is a narrative criteria. There is a high probability that waters that are eligible for secondary contact use designation will be a tributary of a primary contact use designated waterbody. As such, the secondary use stream cannot degrade the water quality of the primary use waterbody (antidegradation). This should be the foundation for establishing an appropriate narrative standard for secondary contact use. (SDMC)

Response:

Comment: It is reasonable to adopt a secondary contact use designation that would apply to activities like fishing, boating, wading, and shoreline activities, in which ingestion is unlikely to occur. (IKE, VFA)

Response:

Comment: While there may be substantial justification for adopting a Secondary Recreational Use, since there is no scientific basis to substantiate that a bacteria criteria, numeric or narrative, is

necessary to protect that use. None can be adopted. The rule prohibiting the causing or contributing to the violation of a downstream use will have the natural effect of limiting the bacteria concentration to relatively low levels on a site specific basis. (MAW)

Response:

(3) Clarification or change of state definition of "full body contact" to U.S. EPA's definition of "primary contact recreation."

Comment: SDMC encourages IDEM to change the basis for its recreational use designation from "full body contact", as defined by 327 IAC 2-1.5-2(36) and 327 IAC 2-1-9(15), to primary contact recreation, as defined by the recommendation of the *E. coli* rulemaking workgroup, that is, "Primary Contact Recreation: Any recreational water use in which ingestion of water is likely to occur. These include but are not limited to swimming, kayaking, tubing, windsurfing and water-skiing." (SDMC)

Response:

Comment: SDMC encourages IDEM to establish two classes of primary contact recreation: Class A, which will apply to known and recognized water bodies or recreational areas, including but not limited to beaches, lakes, kayaking runs, and areas of the waters of the state where a high probability of potential for primary contact activities exists; and Class B, where a low probability of primary contact recreational activities exists, where natural conditions threaten the safety of recreational activity participants or where a governmental entity can make a demonstration that primary recreational activities do not occur or are unlikely to occur and reclassification of the water or segment of the water will not degrade the water quality downstream in primary contact recreation Class A designated waters or segments. (SDMC)

Response:

Comment: SDMC encourages IDEM to accept the recommendation of the *E. coli* rulemaking workgroup that all waters initially all waters remain designated as primary contact recreation use in Class A, with criteria based on eight (8) illness per thousand (1000) swimmers. Reclassification as primary contact recreation use, Class B, shall require petition by a governmental entity with public participation, approval by IDEM, and approval by EPA, if necessary. Once the reclassification occurs, the criteria for maintaining Class B use should be based on ten (10) illnesses per one thousand (1000) swimmers. They believe that this change in classification should not be considered anti-backsliding or a change in use designation nor should it require an antidegradation demonstration. (SDMC)

Response:

Comment: It is reasonable to adopt EPA's definition of primary contact definition. (IKE, VFA)
Response:

Comment: Indiana's primary contact use designation should recognize two categories of primary contact use: (a) bathing use at designated public beaches or public swimming areas; and (b) primary contact use that does not occur at designated public beaches or swimming areas. Specific proposed language is contained within the attached paper for your consideration. (CI)
Response:

CONSIDERATION OF OTHER ORGANISMS OR APPROACHES IN ADDITION TO *E. COLI* TO PROTECT AGAINST PATHOGEN BORNE ILLNESSES

Comment: It is not realistic to expect Indiana to do the research necessary to establish other approaches or indicator organisms. *E. coli* is widely accepted as an indicator organism of fecal contamination. (IKE, VFA)
Response:

Comment: STDC has called for the use of enterococci as an indicator for pathogens in conjunction with *E. coli*. For enterococci, EPA recommends a geometric mean not to exceed thirty-three (33) cfu per one-hundred (100) ml for freshwater. They urge IDEM to also investigate using *E. coli* and enterococci, in combination, as indicators of fecal contamination. They also urge IDEM to better utilize the geometric mean standard of one hundred twenty-six (126) cfu per one hundred (100) ml as a better indicator of trends versus the single sample maximum. (STDC)
Response:

Comment: Indiana has required *E. coli* testing in NPDES permits since the initial change from fecal coliform to *E. coli*. Therefore, SDMC encourages IDEM to remain with *E. coli* as an indicator organism for water quality with respect to recreational use assessment. (SDMC)
Response:

Comment: SDMC encourages IDEM to not further the myth that *E. coli* is an indicator of pathogen borne illnesses. The only "acceptable" correlation for either *E. coli* or enterococci is between the log density of the bacterial indicator and the difference in symptomatic highly credible gastrointestinal illness between swimmers and non-swimmers expressed as a rate per one thousand (1000) swimmers. Therefore, IDEM should not refer to the *E. coli* criteria as protection of pathogen borne illnesses There was no attempt to correlate *E. coli* or enteroccci with pathogenic bacteria or viruses, nor was any attempt made to diagnose specific illnesses. (SDMC)

Response:

Comment: There should not be any additional bacterial monitoring to the current *E. coli* requirement. If the technology is available in an affordable and simple test for another more specific indicator bacteria that would indicate the presence of human waste instead of the current nonspecific method that would be helpful for dischargers that have polishing ponds, lagoons and other outside structures that can be contaminated by natural introductions of *E. coli*. Dischargers should only be responsible for the proper treatment of human waste contained in their effluent. (BWWTP)

Response:

Comment: There is nothing in the regulations that requires NPDES dischargers to treat nature. Dischargers should only be responsible for the proper treatment of human waste in their effluent. (CWWTP)

Response:

CONSISTENT APPLICATION OF THE *E. COLI* CRITERIA THROUGHOUT THE STATE

Comment: *E. coli* standards should be applied statewide. (IKE, VFA)

Response:

Comment: SDMC encourages IDEM to use the Great Lakes System methodology to apply criteria to the end-of-the pipe. (SDMC)

Response:

Comment: The *E. coli* criteria should be based upon designated receiving water use and this designation process consistently applied throughout the state. (BWWTP, CWWTP)

Response:

CHANGE IN THE DEFINITION OF "RECREATIONAL SEASON" AND ADOPTION OF YEAR-ROUND DISINFECTION REQUIREMENTS INSTEAD OF ONLY SEASONAL REQUIREMENTS

Comment: (The definition of) recreational season has little meaning. Recreation on or in the water is very temperature and weather dependent. During warm periods in the winter children are very likely to play in the water. Kayakers and canoeists are also likely to be on the water if the weather is

good. Year-round disinfection would have very little financial impact on wastewater treatment plants and would significantly improve water quality. (IKE, VFA)

Response:

Comment: SDMC does not support (the change in the definition of "recreational season") and finds no scientific basis or logical reasoning to justify this change. SDMC finds *E. coli* to be the only mechanism available to determine if recreational uses are protected, yet at the same time finds the criteria to be scientifically unacceptable and indefensible. (SDMC)

Response:

Comment: SDMC investigated the potential costs of year-round disinfection versus the current seasonal disinfection requirements. Based on the current criteria (established using the eight (8) illnesses per one thousand (1000) swimmers risk level) the cost of seasonal disinfection (chlorination/dechlorination) is approximately eight thousand, seven hundred eighty (8,780) dollars annually. If year-round disinfection were required, then the cost would increase to fourteen thousand, nine hundred seventy-five (14,975) dollars annually. Other, larger plants will incur more costs and smaller plants will incur less costs, but those increases may have a significant bearing on their annual budget. (SDMC)

Response:

Comment: Primary contact recreational sites, as defined by the recommended definition for "primary contact recreation", normally, are available for use from Memorial Day through Labor Day. The current disinfection season includes ample time prior and after those dates. The *E. coli* criteria are an indicator of whether the recreational use designation is maintained. Extending the disinfection requirement to year-round has no basis in current research or epidemiological studies and there is no guarantee that such an extension will result in fewer E. coli in beach sand. (SDMC)

Response:

Comment: Year-round disinfection is not warranted. The purported basis for the change is that research has determined that generally *E. coli* (excluding hemorrhagic *E. coli*) persists in the environment, including the sediments, for substantial periods of time, including through the winter season. However, this *E. coli* itself is non pathogenic so the only harm caused by its survival is the weakening of the justification to use it as a marker. It is well accepted in the scientific community that actual pathogens for which *E. coli* is a marker do not survive winter, at least in Indiana. Therefore, there is no scientific justification for requiring NPDES permit holders to incur the substantial additional

expense of year-round disinfection. (MAW)

Response:

Comment: The disinfection requirement for dischargers needs to remain seasonal. Since many dischargers use chlorine to disinfect, changing to a year-round disinfection requirement would only mean more residual chlorine discharging into surface waters, which can react with organic compounds to produce disinfection by-products that can have an adverse impact on human health and aquatic life, and of a particular concern in water bodies used for drinking water and areas where aquatic life may be adversely impacted. (CWWTP)

Response:

Comment: Since many dischargers use chlorine to disinfect, the Town of Brownsburg is opposed to this change because the long lasting effects of residual chlorine on aquatic life year-round are largely unknown. (BWWTP)

Response:

Comment: The ORSANCO requirements of year-round disinfection for Ohio River dischargers should not be used as an example to require other Indiana dischargers to disinfect year-round. The mere volume of Ohio River can dilute chemicals, minimizing the impact on aquatic life. Smaller receiving streams are less tolerant of chemicals such as chlorine. Current disinfection requirements, April through October, are believed to be unavoidable and necessary to protect human health, based on the premise that receiving streams, during the summer months, are being used for some type of recreational purpose. In the winter months, this would not be the case. The presence of chlorine does affect aquatic life and even residual chlorine can sometimes have harmful effects on fish life. They question whether any biological studies have been conducted on the effects on aquatic life from chlorination and dechlorination chemicals during the winter months. (BWWTP, CWWTP)

Response:

Comment: Before a change to year-round disinfection is seriously considered, the number of Indiana cases of waterborne illnesses associated with possible exposure to wastewater effluents during winter months should be documented and examined. Wastewater treatment plants have been discharging during the winter months without disinfection for several years. (BWWTP, CWTTP)

Response:

Comment: Year-round disinfection would adversely impact dischargers financially. The additional cost for materials/product would increase along with operational costs for electricity, testing, and manpower. Year-round disinfection requirements may also require some combined sewer overflow treatment installations to be upgraded. (BWWTP, CWWTP)

Response:

Comment: Regarding the studies that indicate the presence of persistent *E. coli* in the environment, they question whether it is purely human *E. coli*. If not, they question whether it is cost effective to require dischargers to chlorinate year-round if it will not eliminate or significantly reduce the number of persistent *E. coli* in receiving streams. (BWWTP, CWWTP)

Response:

IMPLEMENTATION OF *E. COLI* CRITERIA

Comment: Assessment of compliance should be based on a sixty (60) day averaging period and a minimum of ten (10) samples. Due to the inherent uncertainties in *E. coli* sampling results, ten (10) samples over sixty (60) days will greatly enhance the reliability of compliance assessment. In addition, the rule should allow that no more than twenty (20) percent of samples taken in a sixty (60) day period may exceed the single sample maximum. Most states, thirty-one (31) of fifty (50) apply some type of data exclusion rule whereby five (5) to twenty (20) of the data can exceed some predetermined value. (CI)

Response:

Comment: IDEM needs to develop alternative ways to determine compliance with the *E. coli* criteria. There also needs to be some consideration of how the criteria will be applied during wet weather. (BWWTP, CWWTP)

Response:

Comment: IDEM needs to formally include alternative means of monitoring *E. coli* if the methods are available. IDEM currently allows the opportunity for plants to run comparison tests between the method approved in the rules and similar methods. These similar methods need to be included so that the time consumption and additional expenses of comparison tests can be eliminated. There also needs to be consideration of alternative limits based upon which method is being used. Some methods have been found to provide false negative and false positive results that can lead to violations or one hundred (100) percent compliance depending on the choice of method. If the

comparison of results have found that a test tends to report low or high numbers, then alternative limits based upon test method should be considered. (BWWTP, CWWTP)

Response:

Comment: Changing the reporting of the daily maximum limit for *E. coli* (235 mg/l) should be seriously considered by the workgroup. The reporting of a single sample does not account for errors in sampling and testing. A more accurate reporting method would be to report a weekly average value from daily maximum samples using a geometric mean. This change in reporting would only alter the *E. coli* daily maximum limit of 235 mg/l, it would only change the reporting method. (BWWTP)

Response:

Comment: IDEM needs to write Indiana's water quality criteria for bacteria with the idea that limits must be reasonable and attainable for dischargers otherwise there is no point of setting a limit that a discharger cannot meet. (CWWTP)

Response:

Comment: The SDMC encourages IDEM to implement the various criteria as follows:
Primary contact recreation, Class A: In-stream water quality criteria and bathing beaches: Base on eight (8) illnesses per one thousand (1000) swimmers; monthly geometric mean shall not exceed one hundred and twenty five (125) cfu; no samples collected in any given month shall exceed the single sample maximum of two hundred and thirty five (235) cfu (seventy-five (75) percent confidence level). Wastewater treatment plant discharges: Base on eight (8) illnesses per one thousand (1000) swimmers; monthly geometric mean shall not exceed one hundred and twenty five (125) cfu; no more than ten (10) percent of samples collected in any given month shall exceed the single sample maximum of two hundred and thirty five (235) cfu (seventy-five (75) percent confidence level).
Primary contact recreation, Class B: In-stream water quality criteria: Base on ten (10) illnesses per one thousand (1000) swimmers, monthly geometric mean shall not exceed two hundred and six (206) cfu; no samples collected in any given month shall exceed the single sample maximum of nine hundred and forty one (941) cfu (ninety-five (95) percent confidence level). Wastewater treatment plant discharges: Base on ten (10) illnesses per one thousand (1000) swimmers, monthly geometric mean shall not exceed two hundred and six (206) cfu; no more than ten (10) percent of samples collected in any given month shall exceed the single sample maximum of nine hundred and forty one (941) cfu (ninety-five (95) percent confidence level). (SDMC)

Response:

Comment: The SDMC encourages IDEM to implement the various criteria as follows: **Secondary contact recreation**: In-stream water quality criteria: At no time shall *E. coli* density reach a level sufficient to impair downstream primary contact recreation or public water supply existing or designated uses. Wastewater treatment plant discharges: *E. coli* limitations shall be waived provided the facility disinfects the facility effluent to maintain *E. coli* densities no greater than one thousand (1000) cfu; *E. coli* density is maintained at a level that ensures in-stream compliance with the narrative criteria; or coliform bacteria group does not exceed the criteria established for public water supply, whichever is more stringent. Compliance will be determined by an initial six-month monitoring program to ensure the chosen method of disinfection protects the designated use and downstream existing or designated uses. (SDMC)

Response:

ESTABLISHMENT OF TECHNOLOGY-BASED EFFLUENT LIMITS

Comment: Technology-based limits might be acceptable but the technology would have to be evaluated on a case by case basis. There would have to be some mechanism that would insure that the technology would function under all operating conditions. (IKE, VFA)

Response:

Comment: SDMC encourages IDEM to apply bacterial criteria to the discharge pipe and encourages IDEM to implement those criteria as recommended. Technology-based effluent limits are difficult to determine and are dependent upon the technology used. (SDMC)

OTHER *E. COLI* TESTING METHODOLOGIES

Comment: Any established and scientifically validated methods should be acceptable. (IKE, VFA)

Response:

Comment: (Regarding other *E. coli* testing methodologies) SDMC encourages IDEM to standardize rule language for the entire state that governs methods of analysis. SDMC suggests that the language found in 327 IAC 2-1.5-10 is appropriate and adequate to ensure that proper testing procedures are used and that new improved procedures can be added. (SDMC)

Response:

***E. COLI* EFFLUENT LIMITS FOR WASTE STABILIZATION LAGOONS**

Comment: Data presented to the *E. coli* workgroup indicates a wide variation in *E. coli* densities for waste stabilization lagoons. However, even though lagoon systems discharge infrequently,

they are still point sources and should be subject to the same requirements as WWTPs. Therefore, SDMC recommends that waste stabilization lagoons be required to meet the criteria appropriate to the recreational use designation of the receiving water during the seasonal disinfection period. (SDMC)

Response:

OTHER

Comment: STDC opposes any modification of water quality standards which allow more illnesses. As the IDEM Public Notice states, the risk level used by EPA are based on adults and not on children. EPA has now claimed new pathogens and antibiotic resistant bacteria have been identified since EPA's original studies were conducted. (STDC)

Response:

Comment: STDC urges more attention on the actual bacteria and water quality problems. They emphasize the need to identify and reduce known sources. Sources such as perimeter drains to drain septic fields, CSOs, and others should be quantified and addressed to prioritize needs. (STDC)

Response:

Comment: Indiana should focus more on addressing *E. coli* problems rather than changing standards. Our major sources are overflowing sewers, failing septic systems and land application of animal manure. There is much than can be done to reduce or eliminate these sources. (HEC)

Response:

Comment: Individuals with failing septic systems must be required to install effective technology. Eighty (80) percent of Indiana soils are unsuitable for septics yet we install at least fifteen thousand (15,000) new septic systems every year. (HEC)

Response:

Comment: For communities with failing septic systems, more alternatives are needed. Package treatment plants are not always the best option. They are often too expensive for small communities and they have a poor track record. Alternative onsite systems and community systems use soil absorption and treatment have proven effective in other states. Indiana communities desperately need access to these alternatives. (HEC)

Response:

Comment: Municipal sewers that overflow must be stopped. No new connections should be allowed if sewers already overflow in wet weather (or dry). Overflowing systems should be required to treat at the outfall, capture for later treatment or otherwise solve their overflow problems before any new connections are allowed. (HEC)

Response:

Comment: There is a dire need for Indiana to adopt some type of wet weather classification in light of the fact that, due to the fact that the concentration of *E. coli* in wet weather discharges, including urban and rural storm water runoff, as well as CSO's and SSO's, is typically at least an order of magnitude greater than the SSM of 235cfu/100ml. Therefore, these discharges will be in violation of the criteria in themselves and will cause violations in ditches, streams and rivers into which they are discharged. It is clear that non point storm water runoff, due to its sheer volume, is typically the source of most of the bacteria and the use impairment. Indiana should do what numerous states have done and other states are doing, adopt a wet weather classification. (MAW)

Response:

Comment: In accordance with the Clean Water Act (CWA) and consistent with Senate Enrolled Act 431, Indiana should adopt an urban wet weather use designation which allows combined sewer overflow (CSO) communities to suspend water quality standards for up to four days after an overflow event. The rule as proposed by the city of Indianapolis, is based upon state of Massachusetts standards and SEA 431. It would recognize the unique nature of CSO-impacted waters and the intent of SEA 431 within the state's water quality standards and use designations. Nine states have some type of primary contact partial use designation to account for rainfall, combined sewer overflow or other weather conditions. (CI)

Response:

Comment: If there are not major problems during (wet weather events), then there should be alternative (wet weather) limits/reporting requirements, especially for those receiving streams not designated for recreation. (BWWTP, CWWTP)

Response:

Comment: The list of issues in the first notice has overlooked an important and potential source of *E. coli* to receiving waters, i.e., combined sewer overflows. SDMC requests that wet weather issues as they relate to *E. coli* be added to the issue for consideration by IDEM and their *E. coli* rulemaking workgroup. This is an issue of major importance to combined sewered communities, or

WWTPs that are influenced by wet weather conditions. (SDMC)

Response: